

DAVID Y. IGE
GOVERNOR



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CHAIR

LORRAINE H. AKIBA
COMMISSIONER

THOMAS C. GORAK
COMMISSIONER

STATE OF HAWAII
PUBLIC UTILITIES COMMISSION
465 S. KING STREET, #103
HONOLULU, HAWAII 96813

Telephone: (808) 586-2020
Facsimile: (808) 586-2066

website: puc.hawaii.gov
e-mail: puc@hawaii.gov

March 15, 2017

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 – 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: WC Docket No. 16-405

Dear Ms. Dortch:

On February 14, 2017, the Federal Communications Commission ("FCC") released a Public Notice ("Notice"), wherein the Wireline Competition Bureau seeks comment on why the FCC should not initiate proceedings to revoke the authorizations granted to Sandwich Isles Communications, Inc. ("SIC"). In the Notice, the FCC referenced its December 5, 2016 Notice of Apparent Liability for Forfeiture ("NAL")¹ regarding SIC, wherein the FCC found that SIC apparently violated portions of: the Communications Act of 1934, as amended, by failing to maintain its accounts, records, and memoranda as prescribed by the FCC; and the FCC's Rules, by submitting and falsely certifying inaccurate data contained in cost studies from 2002 to 2013 that were used to calculate federal high-cost support.²

Noting SIC's "egregious misconduct and the demonstrated harm to the Universal Service Fund from its apparent violations,"³ the FCC ordered SIC to submit a report explaining why the FCC should not initiate proceedings against SIC to revoke its FCC authorizations, including but not limited to, its 47 U.S.C. § 214 authorizations.⁴

¹Sandwich Isles Communications, Inc., Waimana Enterprises, Inc., Albert S.N. Hee, Notice of Apparent Liability for Forfeiture and Order, File No. EB-IHD-15-00019603, 31 FCC Rcd 12947 (2016).

²Notice at 1 (footnotes omitted).

³Notice at 1.

⁴These authorizations relate to the provision of universal service support to eligible telecommunications carriers.

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While the Hawaii Public Utilities Commission ("commission") does not object to the FCC's initiation of proceedings to revoke the authorizations it has previously granted to SIC, the commission emphasizes that it shares the FCC's commitment to maintain service to all customers on Hawaiian Home Lands, and stands ready to work with the FCC to take appropriate action and coordinate efforts to ensure that said service will be provided.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline C. Ishida". The signature is fluid and cursive, with the first name "Caroline" being more prominent than the last name "Ishida".

Caroline C. Ishida
Chief Counsel

CCI:ljrk